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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

DORIA/MEMON DISCOUNT STORES WAGE
AND HOUR LITIGATION.

Case No. 14-cv-7990 (RWS)

JOSEPH M. HEPPT, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am an attorney at law admitted to practice before this court and I represent the Defendant, Sofiya Doria, as Administrator of the Estate of Mohamed Doria, in this action. I submit this Declaration in opposition to Plaintiffs' motion for partial summary judgment.


2. True and correct copies of the following documents are attached hereto:

- A. Deposition of Sofiya Doria, transcript excerpts of questioning by Christopher Marlborough.
- B. Deposition of Bibi Haniff, transcript excerpts of questioning by Joseph Heppt.
- C. Testimony of Mike Memon at contempt hearing, 9/14/2017, excerpts.
- D. Deposition of Arif Kazi, transcript excerpts of questioning by Christopher Marlborough.
- E. Deposition of Abdourahamane Diop Sow, transcript excerpts of questioning by Joseph Heppt.
- F. Deposition of Abdul Malick Diallo, transcript excerpts of questioning by Joseph Heppt.
- G. Deposition of Angel Cartagena, transcript excerpts of questioning by Joseph Heppt.

- H. Deposition of Lino Bueno, transcript excerpts of questioning by Joseph Heppt.
- I. Deposition of Christopher Bruce, transcript excerpts of questioning by Joseph Heppt.
- J. Deposition of Bibi Bishnauth, transcript excerpts of questioning by Joseph Heppt.
- K. Deposition of Marcelin Auguste, transcript excerpts of questioning by Joseph Heppt.
- L. Deposition of Ronald Agyemang, transcript excerpts of questioning by Joseph Heppt.
- M. Deposition of Santiago Pelma Duran, transcript excerpts of questioning by Joseph Heppt.
- N. Deposition of Sonia Espinosa, transcript excerpts of questioning by Joseph Heppt.
- O. Deposition of Peter Iseguede, transcript excerpts of questioning by Joseph Heppt.
- P. Deposition of Joseph Kofie, transcript excerpts of questioning by Joseph Heppt.
- Q. Deposition of Jocelyn Mandungu, transcript excerpts of questioning by Joseph Heppt.
- R. Deposition of Yolada Nieves, transcript excerpts of questioning by Joseph Heppt.
- S. Deposition of Olugbenga Opensanwo, transcript excerpts of questioning by Joseph Heppt.
- T. Deposition of James Osei-Owusu, transcript excerpts of questioning by Joseph Heppt.
- U. Deposition of Abdur Rahim, transcript excerpts of questioning by Joseph Heppt.
- V. Deposition of David Theodore Richardson, transcript excerpts of questioning by Joseph Heppt.
- W. Deposition of Arlene Rosado, transcript excerpts of questioning by Joseph Heppt.

- X. Deposition of Maria Sumano, transcript excerpts of questioning by Joseph Heppt.
- Y. Deposition of Pedro Ulloa, transcript excerpts of questioning by Joseph Heppt.
- Z. Certificate of Incorporation of Rosy Discounts Inc. Certified by NYS Department of Secretary of State.
- AA. Certificate of Dissolution of Rosy Discounts Inc. Certified by NYS Department of Secretary of State.
- BB. Corporate Records of Bary Discount. Document provided by client from her files.
- CC. Corporate Records of Alif Discount. Document provided by client from her files.
- DD. 2012 Corporate Tax Return of Bargain Buy, Inc. Document provided by client from her files. Bates numbered ESTATE_000115-118.
- EE. US Department of Labor letter to Bargain Buy, Inc. d/b/a Willis Discount, dated 11/5/2-13. Bates numbered ESTATE_000106.
- FF. 2013 Federal Income Tax Return for Popular Discount, Inc. for the period 10/1/2013 through 9/30/2014. Document was produced by Plaintiffs after receipt from accountant in response to subpoena.

I declare under penalty of perjury that the foregoing is true and correct. Executed in New York, New York on August 1, 2018.


JOSEPH M. HEPPT